U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Warren Steel Holdings (OPA) - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #2**
progress
Warren Steel Holdings (OPA)
Z5SG
Warren, OH
Latitude: 41.2710670 Longitude: -80.8391684

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From: Stephen Wolfe, On-Scene Coordinator
Date: 9/21/2018
Reporting Period: 09/17/2018 through 09/21/2018

1. Introduction

1.1 Background

Site Number:	Z5SG	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	OPA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	8/15/2018	**Start Date:**	8/15/2018
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	Y
FPN#:	E18519	**Reimbursable Account #:**	

1.1.1 Incident Category

Time-Critical Removal Action (OPA)

Abandoned transformers located near the banks of the Mahoning River (non-PCB)

note: CERCLA work is occurring simultaneously at the site (https://response.epa.gov/WSH)

1.1.2 Site Description

The Warren Steel Holding Site is a 400-acre abandoned steel facility. The OPA portion of the site is located on the south side of North River Road and includes the main sub-station for the facility. There are approximately 45 transformers and 200 capacitors (oil volume approximately 60,000 gallons) located less than 200 feet from the Mahoning River. When the facility was operating, lagoons were constructed to keep material from entering the Mahoning River; however, since the facility was shut down, the lagoons have not been and are not being maintained, therefore, releases from the transformers and capacitors from the substation pose a direct threat to the Mahoning River.

1.1.2.1 Location

The substation is located on the south side of North River Road near 4000 Mahoning Avenue, Warren, Trumbull County, Ohio. The substation does not have a distinct physical address. The geographical coordinates of the substation are 41º 16’ 03.43” north and -80º 50’ 59.09” west.

1.1.2.2 Description of Threat

The Warren Steel Facility is no longer an operating facility and the transformer substation is not operating. Although there are guards present at the main facility, inspections consist of a simple drive-by and releases from the transformers would not be observed by the guards. The substation is located less than 200 feet from the banks of the Mahoning River and any release from the transformers would reach the river.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA sampled all the transformers in the substation in June 2018. The transformer specialist who sampled all the transformers rated the transformers in poor condition. Sampling indicated that 7 of the transformers would be considered "PCB contaminated" (greater than 50 ppm PCBs) and those transformers will be addressed under the ongoing CERCLA action at the site. There is approximately 60,000 gallons of non-PCB oil located in the transformers and 1,000 gallons of oil located in the capacitors. In addition to the substation, one tank containing a petroleum material is located at one of the outfalls of the facility which leads to the Mahoning River (approximately 3,000 gallons oil).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

For the reporting period, ERRS and their subcontractor mobilized to the site to begin oil removal activities. After discussion with the subcontractor, it was decided to completely remove the smaller transformers as it would be more cost effective than draining the oil. The larger transformers will remain on site once they are drained of oil.

2.1.2 Response Actions to Date

On Monday September 17th, ERRS and their subcontractor arrived on site. A safety briefing was held with the subcontractor and a site walk of the work area was performed. One tanker truck (5,500 gallons) of less than 50 ppm PCB oil was removed from a transformer. The oil was taken to the subcontractor's facility in Twinsburg, Ohio for recycling (low level PCB removal/recycling).

On Tuesday September 18th, two tanker trucks (11,000 gallons) of less than 50 ppm PCB oil was removed from larger transformers. The oil was taken to the subcontractor's facility in Twinsburg, Ohio for recycling (low level PCB removal/recycling).

On Wednesday September 19th, two tanker trucks (11,000 gallons) of less than 50 ppm PCB oil was removed from larger transformers. The oil was taken to the subcontractor's facility in Twinsburg, Ohio for recycling (low level PCB removal/recycling).

On Thursday September 20th, one tanker truck (5,500 gallons) of less than 50 ppm PCB oil was removed from a transformer. The oil was taken to the subcontractor's facility in Twinsburg, Ohio for recycling (low level PCB removal/recycling). ERRSs subcontractor began disassembling the capacitors for removal and preparing the smaller transformers for removal. Inclement weather (tornado warnings, lightening) stopped operations early for the day.

On Friday September 21st, one tanker truck (5,500 gallons) of less than 50 ppm PCB oil was removed from a transformer. The oil was taken to the subcontractor's facility in Twinsburg, Ohio for recycling (low level PCB removal/recycling). ERRSs subcontractor continued disassembling the capacitors and preparing the smaller transformers for removal.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Ongoing

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
petroleum material	liquid	3,000 gallons	BOL 01676	disposal	Safety-Kleen Systems, Kent, Ohio
transformer oil (less than 50 ppm PCBs)	liquid	38,500 gallons	multiple BOLs	treatment/recycling	Emerald Transformer PPM, LLC. Twinsburg, Ohio

2.2 Planning Section

2.2.1 Anticipated Activities

Complete draining oil from larger transformers
Completely remove smaller transformers and their contents
remove oil containing capacitors

2.2.1.1 Planned Response Activities

drain/remove non-PCB transformers and capacitors located in the substation adjacent to the Mahoning River

2.2.1.2 Next Steps

Continue operations

2.2.2 Issues

Inclement weather caused operations to end earlier than expected on Thursday September 20.

2.3 Logistics Section

ERRS is providing all logistics

2.4 Finance Section

2.4.1 Narrative

On June 4, 2018 FPN E18519 was opened for $25,000 for the project for initial work.

On July 20, 2018 an OPA 90 Project Plan was approved by the USCG National Pollution Fund Center increasing the ceiling to $315,000.

Note: the subcontractor is giving a credit of $0.56 per gallon for the re-usable oil. A credit for the recyclable transformer material (copper/steel/aluminum) will also be given for all transformers removed from the site. These credits will be applied to the total cost of the project.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$200,000.00	$9,000.00	$191,000.00	95.50%
TAT/START	$25,000.00	$3,500.00	$21,500.00	86.00%
Intramural Costs				
USEPA - Direct	$44,392.00	$5,000.00	$39,392.00	88.74%
USEPA - InDirect	$45,608.00	$2,500.00	$43,108.00	94.52%
Total Site Costs	$315,000.00	$20,000.00	$295,000.00	93.65%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

EPA and ERRS Rm are fulfilling this role.

ERRS subcontractor provided a safety plan detailing their work including working from heights and hot work permits.

2.5.2 Liaison Officer

2.5.3 Information Officer

3. Participating Entities

No information available at this time.

4. Personnel On Site

EPA 1
START 1
ERRS (including subcontractors) 4

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

https://response.epa.gov/WSHOPA

for CERCLA related work at the site including PCB contaminated transformers
https://response.epa.gov/WSH

6.2 Reporting Schedule

7. Situational Reference Materials

No information available at this time.